

# DEPARTMENT OF INFORMATION SERVICES



COUNTY OF SAN BERNARDINO  
GENERAL SERVICES GROUP

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- ☐ Communications Division • 777 E. Rialto Ave. • San Bernardino, CA 92415-0740 • (909) 387-2010
- ☒ Radio Division • 1743 West Miro Way • Rialto, CA 92376 • (909) 356-3900

DIANAH NEFF  
Director

February 15, 1996

William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W. Room 222  
Washington, D.C. 20554

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RE: PR Docket No. 93-144; PP Docket No. 93-253; Gn Docket 93-252

Dear Mr. Caton:

Enclosed are copies that were inadvertently not sent with the ordinals on February 14, 1996.

Respectfully submitted,

County of San Bernardino, CA

By:

David Seidel

Radio Division Chief

1743 Miro Way

Rialto, CA 92376

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RE: Pr Docket No. 93-144; PP Docket No. 93-253; Gn Docket 93-252

Dear Mr. Caton:

The County of San Bernardino, CA hereby submits the following comments in response to the Commission's Second Further Notice of Proposed Rulemaking in the above referenced proceeding. The County operates a consolidated regional trunked and conventional public safety radio system utilizing spectrum in all the 800 MHz bands. This radio system supports 105 separate agencies that include Federal, State and local public safety users. Some of our licensed channels are offset to channels proposed to be auctioned by the Commission. This radio system is vital to providing public safety services to the citizens of San Bernardino County.

The County of San Bernardino is located in Southern California. On the west it shares borders with Los Angeles County and Orange County. The border is the Colorado River and is shared with the States of Nevada and Arizona. The county is approximately 20,000 square miles in size and has a population of over 1.5 million. The county is larger in size and population than several states. Radio spectrum in the county is impacted by proximity to the Los Angeles area.

The County was granted licenses under wavier in 1987 allowing it to construct the current radio System. These licenses include channels offset by 12.5 KHz to the regularly assigned frequencies. The system has grown to over 8,000 units. Thirteen channels are in the upper 10 MHz SMR band proposed to be auctioned. The County cannot effectively operate it's system without these channels.

JANET L. BLANK

Director

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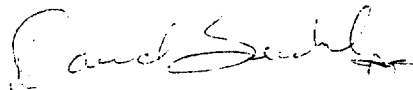
The County has no objection to the Commissions proposal to promote competition and deploy new SMR technologies. The proposal to require the auction winners to pay to move existing users to suitable new channels is reasonable. The County is concerned that there is no suitable spectrum to move to in our geographic area. The County was forced to seek the wavier due to a complete lack of spectrum to build the County's system.

The other concern of the County is the further crowding of bands available to public safety users this rule making will create. The County is participating in the Public Safety Wireless Advisory Committee (PSWAC). This process will identify and document the needs of public safety for additional spectrum. This current docket will add to these needs in many areas of the country. The County expects the commission to act quickly to allocate the spectrum required to provide public safety services to the citizens of this country.

Respectfully submitted,

County of San Bernardino, CA

By:

A handwritten signature in dark ink, appearing to read "David Seidel", with a stylized flourish at the end.

David Seidel

Radio Division Chief

1743 Miro Way

Rialto, CA 92376